

WILMER CUTLER PICKERING
HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)
Sonal.Mehta@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, California 94306
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
ROSS E. FIRSENBAUM (*pro hac vice*)
Ross.Firsenbaum@wilmerhale.com
RYAN CHABOT (*pro hac vice*)
Ryan.Chabot@wilmerhale.com

PAUL VANDERSLICE (*pro hac vice*)
Paul.Vanderslice@wilmerhale.com
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800

Attorneys for Defendant Meta Platforms, Inc.

ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
Molly.Jennings@wilmerhale.com
2100 Pennsylvania Avenue NW
Washington, DC 20037
Telephone: (202) 663-6000

MICHAELA P. SEWALL (*pro hac vice*)
Michaela.Sewall@wilmerhale.com
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF MOLLY JENNINGS
IN SUPPORT OF META PLATFORMS,
INC.'S MOTION TO EXCLUDE
TESTIMONY OF KEVIN KREITZMAN
AND MICHAEL A. WILLIAMS**

Judge: Hon. James Donato

1 I, MOLLY JENNINGS, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration
4 in support of Meta's Motion to Exclude the Testimony of Kevin Kreitzman and Michael A.
5 Williams.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of
7 Michael A. Williams, dated July 7, 2023.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Reply Report
9 of Michael A. Williams, dated September 15, 2023.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the
11 deposition transcript of Michael A. Williams, held on September 26, 2023.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of Kevin
13 Kreitzman, dated July 7, 2023.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of the Expert Reply Report
15 of Kevin Kreitzman, dated September 15, 2023.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the
17 deposition transcript of Kevin Kreitzman, held on October 2, 2023.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of
19 Joshua S. Gans, dated July 7, 2023.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the
21 deposition transcript of Joshua S. Gans, held on September 26, 2023.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the
23 deposition transcript of Scott Fasser, held on September 7, 2023.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of an excerpt from the
25 consolidated financial statements of Wirtualna Polska Capital Group for the year ending December
26 31, 2022.

1 I declare that the foregoing is true and correct under penalty of perjury.

2 Executed on this 6th day of October, 2023, in Washington, District of Columbia.

3 By: /s/ Molly Jennings

4 Molly Jennings

SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from the signatories.

By: /s/ Sonal N. Mehta
Sonal N. Mehta